STATEMENT OF BASIS

General Electric Company Winchester Lamp Plant Winchester, Virginia

EPA ID No. VAD 070 360 219

I. Introduction

EPA developed a National Corrective Action Prioritization System (NCAPS) to evaluate hazardous waste management facilities based on human health and environmental risks posed by actual or potential releases to the environment, potential migration pathways, target receptors, and waste characteristics. Each facility was designated as either High, Medium or Low priority. EPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Program is currently focusing its efforts on cleaning up high priority sites to achieve the maximum public health and environmental benefits, in response to national clean-up goals have been established for the program.

General Electric Company's (GE) Winchester Lamp Plant (hereafter called the "Facility") was determined to be a high priority facility. This Statement of Basis (SB) describes and summarizes information regarding this Facility located in Winchester, Virginia. Following a thorough site inspection and an evaluation of existing records for the Facility, the Environmental Protection Agency (EPA) believes that no further corrective action is necessary at the Facility. The purpose of this SB is to solicit public comment on EPA's proposal that no further corrective action is required at this Facility.

II. Facility Background

The GE Winchester Lamp Plant is located about 3 miles south of Winchester, Frederick County, Virginia and the site is situated on a 125 acre parcel of land. Route 651 borders the property to the northwest and the southeastern boundary of the facility is bordered by the Baltimore and Ohio (B&O) right of way property. Private residences are located along Route 652, which is the northeast border of the site and Route 37 runs along the southwestern boundary.

The Winchester Lamp Plant began operation in 1975 and is currently producing household incandescent light bulbs under its own name and private brand names. The major components of the light bulb are produced at other facilities and shipped to Winchester Lamp Plant for assembly. Glass bulbs are coated with a silica based powder to create soft white, bug yellow, and dawn pink bulbs. Chromium compounds are currently used to create the yellow and pink colors but, prior to 1989, the yellow color was created with the use of cadmium.

III. Summary of Facility Areas

EPA identified a total of twenty-seven (27) potentially contaminated areas at the Winchester Lamp Plant. To help keep track of these areas, EPA labeled them as either Solid Waste Management Units (SWMUs), Hazardous Waste Management Units (HWMUs) or Areas of Concern (AOCs). Table 1 lists all the HWMUs, SWMUs and AOCs that were identified at the Facility.

Table 1 - Descriptions of Units

UNIT	DESCRIPTION
HWMU 1 / SWMU 1	Hazardous waste container storage area
SWMU 2	Oily sludge satellite accumulation area
SWMU 3	Spent batteries/ballasts from fluorescent lamps satellite accumulation area
SWMU 4	Cadmium coated bulb crusher/compactor and roll-off container storage area
SWMU 5	Spent batteries/ballasts from fluorescent lamps satellite accumulation area
SWMU 6	Roll-off container of lead stem mounts and tubing
SWMU 7	Empty aerosol can satellite accumulation area
SWMU 8	Hazardous waste flammable liquids, less than 90 day storage area
SWMU 9	Satellite accumulation area - 1 drum solid/1 drum liquid "getter" wastes
SWMU 10	Former cadmium coated bulb crusher/compactor and dust collector
SWMU 11	Empty aerosol can satellite accumulation area
SWMU 12	Empty aerosol can satellite accumulation area
SWMU 13	Satellite accumulation area - 1 drum solid/1 drum liquid "getter" wastes
SWMU 14	Empty aerosol can satellite accumulation area
SWMU 15	Empty aerosol can satellite accumulation area
SWMU 16	Parts cleaner filter satellite accumulation area
SWMU 17	Paint filter satellite accumulation area
SWMU 18	Empty aerosol can satellite accumulation area
SWMU 19	Roll-off container of lead stem mounts and tubing
SWMU 20	Parts cleaner filter satellite accumulation area
SWMU 21	Empty aerosol can satellite accumulation area
SWMU 22	Satellite Accumulation area - 1 drum solid/1 drum liquid "getter" wastes
SWMU 23	Roll-off container of lead stem mounts and tubing

SWMU 24	Ethanol containing drum from cement mixing operation, satellite accumulation area
SWMU 25	Crushed bulb Tort dust collector
SWMU 26	Roll-off container of lead stem mounts and tubing
AOC 1	Site of two x 20,000 gallon former underground fuel tanks

[&]quot;Getter Wastes" consist of methanol, phosphorus, nitrate powder, and cryolite (Na₃AlF₆).

IV. Release History

EPA, in coordination with the Virginia Department of Environmental Quality (VDEQ), has researched this Facility by performing a file review and site survey to identify possible releases to the environment. As a result of this search, only HWMU 1 was identified as potentially having a release. HWMU 1 is a concrete pad used for storing drums of hazardous waste. (See Attachment 1 for photos of unit) During a 1987 Virginia Department of Waste Management (DWM, now known as DEQ) hazardous waste inspection, several overfilled drums were observed to be leaking waste material, but the waste was confined to the tops of the drums. In 1989, GE began a program to clean the concrete pad of any contamination, under the supervision of Virginia's DWM. The concrete pad was pressure washed, rinsed with clean water numerous times and soil samples were taken around the pad to ensure that the area had been successfully remediated. The soil sampling results showed no detectable levels of contamination and Virginia's DEQ provided approval of the "clean closure" certification for the unit on November 4, 1998. "Clean closure" is a term that is used to define the process of completely removing all waste that was treated, stored, or disposed in a hazardous waste unit.

AOC 1 was the site of two former underground fuel tanks at this Facility. These tanks were removed and GE sampled the soil and groundwater in the area to identify if there had been any releases associated with the tanks. No contamination was found and the site was deemed "cleaned closed" by Virginia's DEQ Underground Storage Tank Program. There were no documented releases associated with this area.

There are four mediums through which humans could possibly be exposed to potential releases from units at this Facility:

Air: There is no documented observed, unpermitted, or on-going air releases at the Facility from any of the units.

Groundwater: Currently there is no known or reasonable suspected contamination to the groundwater from any of the units at the Facility.

Surface Water: There are no surface water pathways in close proximity to any of the units at the Facility. Currently, there is no known or reasonable suspected contamination to the surface water.

Soil: Currently there is no known or reasonable suspected contamination to the soil from any of the units at the Facility.

Based on the review of all available resources and a thorough site inspection, EPA is proposing that no further corrective action is required at the General Electric Company's Winchester Lamp Plant.

V. Public Participation

EPA is requesting comments from the public on its proposal that no corrective action will be required at this Facility. The public comment period will last forty-five (45) calendar days from the date that this matter is publicly noticed in a local newspaper (June 10 to July 26, 1999) Comments may be sent to EPA in writing at the EPA address listed below, and all commentors will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Michael Jacobi of the EPA Regional Office (215-814-2772).

The Administrative Record contains all information considered by EPA when making this proposal to not require corrective action at this Facility. The Administrative Record is available at the following locations:

U.S. Environmental Protection Agency Region III 1650 Arch Street - 3WC23 Philadelphia, PA 19103-2029 Contact: Mr. Michael Jacobi

Voice: (215) 814-3435 Fax: (215) 814-3113

Hours: Mon-Fri, 9:00 AM - 5:00 PM

E-mail: jacobi.mike@epa.gov (ASCII text only)

Handley Regional Library 100 West Piccadilly Street Winchester, VA 22601 (540) 662-9041

Contact: Ms. Kim Bean

Hours: Mon - Wed, 10:00 AM - 9:00 PM Thurs - Sat, 10:00 AM - 5:00 PM

Following the forty-five (45) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to the proposal that no further action is needed at this Facility, EPA will seek public comments on the revised proposal.